



MGP of Indiana, LLC
7 Ridge Avenue
Lawrenceburg, Indiana 47025
800.255.0302
www.mgpingredients.com

October 29, 2012

Indiana Department of Environmental Management
Office of Air Quality – Compliance Data Section
100 N. Senate Avenue
MC61-53IGCN1003
Indianapolis, IN 46204-2251

Dear Gentlemen/Madam:

Re: Quarterly Deviation and Compliance Monitoring and Excess Emissions Reports Part
70 Operating Permits No.: T029-24407-00005

On December 27, 2011 ownership of this plant changed from Lawrenceburg Distillers
Indiana, LLC to MGPI of Indiana, LLC.

Enclosed is the referenced report for the third quarter of 2012.

Very Truly Yours,

W.R. Graves

W.R. Graves
EHS Manager

WRG/mhm
Enclosure

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: MGPI of Indiana, LLC
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-24407-00005

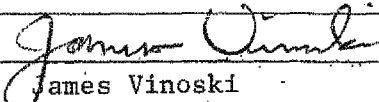
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☒ Report (specify) Quarterly Compliance Report
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:



Printed Name: James Vinoski

Title/Position: Plant Manager

Phone: (812) 532-4172

Date: October 29, 2012

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: MGPI of Indiana, LLC
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-24407-00005
Facility: One (1) steam boiler, identified as EU-96
Parameter: Amount of coal burned or equivalent
Limit: 85,096 tons of coal per twelve (12) consecutive month period, equivalent to 214.2 tons of PM per year, with compliance determined at the end of each month.

For purposes of showing compliance with this fuel limit, the following equivalencies shall be used: one (1) million cubic feet of natural gas is equivalent to 0.021 tons of coal, one kilogallon of No. 6 fuel oil is equivalent to 0.138 tons of coal, and one (1) ton of wood is equivalent to 0.056 tons of coal.

YEAR: 2012

Month	Coal burned or equivalent (tons)	Coal burned or equivalent (tons)	Coal burned or equivalent (tons)
	This Month	Previous 11 Months	12 Month Total
July	1	20,776	20,777
August	2	17,566	17,568
September	2	13,270	13,272

☒ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: William R. Graves

Title/Position: EHS Manager

Signature: William R. Graves

Date: October 29, 2012

Phone: (812) 532-4158

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: MGPI of Indiana, LLC
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-24407-00005
Facility: One (1) steam boiler, identified as EU-97
Parameter: #2 Fuel Oil Burned
Limit: 1,848,000 gallons per twelve (12) consecutive month period, equivalent to SO₂ emissions of 39.9 tons per year, with compliance determined at the end of each month.

YEAR: 2012

Month	#2 Fuel Oil (gallons)	#2 Fuel Oil (gallons)	# 2 Fuel Oil (gallons)
	This Month	Previous 11 Months	12 Month Total
July	0	0	0
August	0	0	0
September	0	0	0

☒ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: William R. Graves

Title/Position: EHS Manager

Signature: William R Graves

Date: October 29, 2012

Phone: (812) 532-4158

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MGPI of Indiana, LLC
Source Address: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T 029-24407-00005

Months: July to September Year: 2012

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response step(s) taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☒ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Step(s) Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Step(s) Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Step(s) Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Step(s) Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Step(s) Taken:	

Form Completed By:

William R. Graves

Title/Position:

EHS Manager

Date:

October 29, 2012

Phone:

(812) 532-4158

QUARTERLY REPORT
OPACITY MONITOR
BOILER NO.6 - MGPI of Indiana, LLC
FOR THE QUARTER FROM July TO September, 2012

A. EXCESS EMISSIONS SUMMARY

<u>START</u>	<u>END</u>	<u>6 MIN OPACITY</u>		
<u>DATE : TIME</u>	<u>DATE : TIME</u>	<u>READINGS</u>	<u>MAXIMUM AVERAGE</u>	<u>REASON</u>
NONE				<u>CORRECTIVE ACTION</u>

QUARTERLY REPORT
OPACITY MONITOR
BOILER NO.6 - MGPI of Indiana, LLC
FOR THE QUARTER FROM July TO September, 2012

B. OPACITY MONITOR DOWNTIME SUMMARY

<u>START</u> <u>DATE : TIME</u>	<u>END</u> <u>DATE : TIME</u>	<u>DURATION</u> <u>MINUTES</u>	<u>REASON</u>	<u>REPAIRS/ADJUSTMENTS</u>
8/6 08:50	8/6 11:00	130	Quarterly Opacity monitor certification audit	Completed the audit

QUARTERLY REPORT
OPACITY MONITOR
BOILER NO.6 - MGPI of Indiana, LLC
FOR THE QUARTER FROM July TO September, 2012

C. BOILER DOWNTIME SUMMARY

<u>START</u> <u>DATE</u> : <u>TIME</u>	<u>END</u> <u>DATE</u> : <u>TIME</u>	<u>DURATION</u> <u>MINUTES</u>	<u>REASON</u>	<u>REPAIRS/ADJUSTMENTS</u>
7/13 18:45	7/31 22:00	26,115	Summer Maintenance Shutdown	Completed Summer Maintenance Shutdown

8/21 09:45	8/21 16:00	375	Handhole leak on boiler	Repair handhold leak
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8/27 00:35	8/27 09:45	550	Handhole leak on boiler	Repair handhold leak
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TOTAL DOWNTIME - 27,040 minutes

MONTHLY QA LOG SUMMARY SHEET
OPACITY MONITOR
BOILER NO.6 - MGPI of Indiana, LLC
FOR THE MONTH OF July, 2012.

BOILER WAS ON LINE DURING MONTH DAYS/HOURS
12 / 20.75

FAULT LIGHT ON FOR:

Reflector air purge fault
Transceiver air purge fault
Reflector and transceiver air purge fault
Main lamp out of spec
Dirty windows alarm
Off line
Zero drift > 4% opacity
Span calibration drift > 4% opacity

DAYS/HOURS

COMMENTS

<u>DAYS/HOURS</u>	<u>COMMENTS</u>
/	
/	
/	
/	
/	
/	
/	
/	

ALARM/EARLY WARNING LIGHT ON FOR:

Zero drift > 2% opacity
Span drift > 2% opacity
High opacity

DAYS/HOURS

COMMENTS:

<u>DAYS/HOURS</u>	<u>COMMENTS:</u>
/	
/	
/	

CHART RECORDER TIME CHECK WAS OVER 6 MIN. FAST OR SLOW:

NO. OF DAYS/HOURS

COMMENTS:

0 / 0

VALID DATA PERCENTAGE

Total 6 minute valid periods: 3,087.50

Total six minute periods (includes QA checks, malfunction, process downtime) = 3,087.50

% Valid Data = $\frac{\text{Total 6 minute valid periods}}{\text{Total six minute periods}} \times 100 = \underline{100.00}$

REVIEWED BY: W. B. Graves

MONTHLY QA LOG SUMMARY SHEET

OPACITY MONITOR

BOILER NO.6 - MGPI of Indiana, LLC

FOR THE MONTH OF August, 2012

BOILER WAS ON LINE DURING MONTH DAYS/HOURS
30 / 8.58

FAULT LIGHT ON FOR:

DAYS/HOURS

COMMENTS

Reflector air purge fault
Transceiver air purge fault
Reflector and transceiver air purge fault
Main lamp out of spec
Dirty windows alarm
Off line
Zero drift > 4% opacity
Span calibration drift > 4% opacity

/
/
/
/
/
/ 2.17
/
/

(1)

ALARM/EARLY WARNING LIGHT ON FOR:

DAYS/HOURS

COMMENTS:

Zero drift > 2% opacity
Span drift > 2% opacity
High opacity

/
/
/

CHART RECORDER TIME CHECK WAS OVER 6 MIN. FAST OR SLOW:

NO. OF DAYS/HOURS

COMMENTS:

0 / 0

VALID DATA PERCENTAGE

Total 6 minute valid periods: 7,264.16

Total six minute periods (includes QA checks, malfunction, process downtime) = 7,285.83

% Valid Data = $\frac{\text{Total 6 minute valid periods}}{\text{Total six minute periods}} \times 100 = \underline{99.70}$

REVIEWED BY: W.R. Graves

(1) See Opacity Monitor Downtime Summary

MONTHLY QA LOG SUMMARY SHEET

OPACITY MONITOR

BOILER NO. 6 - MCPI of Indiana, LLC

FOR THE MONTH OF September, 2012

BOILER WAS ON LINE DURING MONTH

DAYS/HOURS

30 /

FAULT LIGHT ON FOR:

DAYS/HOURS

COMMENTS

Reflector air purge fault
Transceiver air purge fault
Reflector and transceiver air purge fault
Main lamp out of spec
Dirty windows alarm
Off line
Zero drift > 4% opacity
Span calibration drift > 4% opacity

/
/
/
/
/
/
/
/

ALARM/EARLY WARNING LIGHT ON FOR:

DAYS/HOURS

COMMENTS:

Zero drift > 2% opacity
Span drift > 2% opacity
High opacity

/
/
/

CHART RECORDER TIME CHECK WAS OVER 6 MIN. FAST OR SLOW:

NO. OF DAYS/HOURS

COMMENTS:

0 / 0

VALID DATA PERCENTAGE

Total 6 minute valid periods: 7,200.00

Total six minute periods (includes QA checks, malfunction, process downtime) = 7,200.00

% Valid Data = $\frac{\text{Total 6 minute valid periods}}{\text{Total six minute periods}} \times 100 = \underline{100.00}$

REVIEWED BY: W. R. Graves

CERTIFICATION AUDIT
40CFR60, APP. B, PS1
CONTINUOUS OPACITY
MONITORING SYSTEM (COMS)

MGP Ingredients
Unit 6 Boiler
560
5602257



14-Aug-12

PREPARED FOR:
MGP Ingredients
Unit 6 Boiler
Lawrenceburg, IN

Teledyne Monitor Labs, Inc., 35 Inverness Drive East, Englewood, Colorado 80112

MGP-EPA0000625

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INTRODUCTION

Monitor Labs, Inc. was contracted to conduct a performance evaluation in accordance with USEPA 40CFR60, App. B, PS 1 on the opacity monitoring system located at the site stated below. All results are within specification.

Customer name	<u>MGP Ingredients</u>		
Monitor Location	<u>Unit 6 Boiler</u>		
Facility Location (city, state)	<u>Lawrenceburg, IN</u>		
Instrument Manufacturer	<u>Teledyne Monitor Labs, Inc.</u>		
Instrument Model #	<u>560</u>		
Instrument Serial #	<u>5602257</u>		
Today's Date (mo/dd/yr)	<u>8/14/2012</u>		
Monitoring Pathlength (in meters)(0.305m=1ft)	<u>1.575</u>		
Emission Outlet Pathlength (in meters)	<u>1.626</u>		
Flange to Flange Distance (in meters)	<u>2.648</u>		
OPLR	<u>0.516</u>		
Applicable Standard (% Opacity)	<u>20.0</u>		
Person Conducting Test	<u>Dave Spitzer</u>		
Date of Cal Error Testing (mo/dd/yr)	<u>7/7/2012</u>		
Low Neutral Density Filter Value	<u>0.069</u>	Tool No.	<u>S1815</u>
Mid Neutral Density Filter Value	<u>0.126</u>	Tool No.	<u>S6754</u>
High Neutral Density Filter Value	<u>0.190</u>	Tool No.	<u>S7072</u>

TEST PROCEDURES

Calibration Error Test

The Calibration Error Test was performed IAW paragraph 8.1, 3(ii) of the 40CFR60, App B, PS1. Low, mid, and high range filters certifiable to the National Institute of Standards and Testing were used. Fifteen non-consecutive tests were completed using the three filters (five readings with each filter). The calibration error is represented by the sum of the mean differences plus 95 percent confidence interval expressed as a percentage of the known filter value.

RESULTS

Test	Specification	Actual
Calibration Error (%)	$\leq 3\%$	0.69 Low 0.83 Mid 0.28 High

CALIBRATION FILTER SELECTION

Nominal attenuator optical density based upon Applicable Standard:

(ASTM D 6216, Section 7.5)

Calibrated Attenuator Opacity %		
Applicable Standard:	10 - 19 % Opacity	> 20 % Opacity
Low-range	5 - 10	10 - 20
Mid-range	10 - 20	20 - 30
High-range	20 - 40	30 - 60

Actual filter values:

(Actual Filters are chosen from filters with OD values closest to either *nominal* values or *desired* values.)

	Optical Density	Opacity %**	Tool No.
Low	0.0693	15.19	S1815
Mid	0.1257	25.83	S6754
High	0.1896	36.28	S7072


*IAW 40CFR60, App. B, PS1, 12.1, eq, 1-1

**Opacity % = $100 \times (1 - 10^{(-2 \times \text{OD}_{\text{of Filter}} \times \text{OPLR})})$, IAW Opacity Monitor Instruction Manual

CALIBRATION ERROR DETERMINATION

Person Conducting Test	<u>Dave Spitzer</u>	Analyzer Manufacturer	<u>Teledyne Monitor Labs, Inc.</u>		
Affiliation	<u>Teledyne Monitor Labs, Inc.</u>	Model/Serial No.	<u>560</u>	/	<u>5602257</u>
Date	<u>7/7/2012</u>	Location	<u>Lawrenceburg, IN</u>		
Monitoring System Output Pathlength Corrected?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	OPLR= <u>0.516</u>		
Calibrated Neutral Density Filter Values					
Desired Opacity:			Path Adjusted Optical Density (Opacity):		
Low-Range	<u>10 - 20</u>	Low-Range	<u>0.0693</u>	(<u>15.19</u>) <u>S1815</u>
Mid-Range	<u>20 - 30</u>	Mid-Range	<u>0.1257</u>	(<u>25.83</u>) <u>S6754</u>
High-Range	<u>30 - 60</u>	High-Range	<u>0.1896</u>	(<u>36.28</u>) <u>S7072</u>

Run Number	Calibration Filter Value (Path-Adjusted Percent Opacity)	Instrument Reading (Opacity), percent	Arithmetic Difference (Opacity), percent		
			Low	Mid	High
1-Low	15.19	14.50	-0.69		
2-Mid	25.83	25.00		-0.83	
3-High	36.28	36.00			-0.28
4-Low	15.19	14.50	-0.69		
5-Mid	25.83	25.00		-0.83	
6-High	36.28	36.00			-0.28
7-Low	15.19	14.50	-0.69		
8-Mid	25.83	25.00		-0.83	
9-High	36.28	36.00			-0.28
10-Low	15.19	14.50	-0.69		
11-Mid	25.83	25.00		-0.83	
12-High	36.28	36.00			-0.28
13-Low	15.19	14.50	-0.69		
14-Mid	25.83	25.00		-0.83	
15-High	36.28	36.00			-0.28
Remarks: (1) Calibration Error <= 3% Opacity.			Arithmetic Mean (Equation 1-3)	x	-0.69
			Standard Deviation (Equation 1-4)	Sd	0.00
			Confidence Coefficient (Equation 1-5)	cc	0.00
			Calibration Error % (Equation 1-6)	Er	0.69

 SENDER: COM/ 7010 1060 0000 9132 9696 ON DELIVERY	
<p>■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>	<p>A. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>
<p>1. Article Addressed to:</p> <p>Indiana Department of Environmental Management Office of Air Quality-Compliance Data Section 100 N. Senate Avenue MC61-531GCN1003 Indianapolis, IN 46204-2251</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number: 7010 1060 0000 9132 9696 (Transfer from service)</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7010 1060 0000 9132 9696

U.S. Postal ServiceTM

CERTIFIED MAILTM RECEIPTTM

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		

Total Po. **Indiana Department of Environmental Management**

Sent To **Office of Air Quality-Compliance Data Section**

Street, Apt. or PO Box **100 N. Senate Avenue**

City, State **MC61-531GCN1003**

Indianapolis, IN 46204-2251

PS Form 3800, August 2006 See Reverse for Instructions